

Exhibit B

Brown, Jase A.

From: Brown, Jase A.
Sent: Monday, November 02, 2020 4:35 PM
To: Brown, Jase A.
Subject: FW: Fieldwood - Protective Order

From: Carlson, Clifford [mailto:Clifford.Carlson@weil.com]
Sent: Thursday, October 29, 2020 11:24 AM
To: Brandon Bains ; 'Eisenberg, Philip' ; Elliot Scharfenberg ; Grzyb, Darren ; Perez, Alfredo ; Liou, Jessica ; Marzocca, Anthony ; Swenson, Robert
Cc: 'Brescia, Duane J.' ; Zuber, Scott A. ; '*lwoodard@harrisbeach.com' (lwoodard@harrisbeach.com) ; Shahinian, Armen ; 'Ward, Christopher R.' ; 'Michael Collins' ; 'rmiller@manierherod.com' ; Freedman, Terri Jane
Subject: RE: Fieldwood - Protective Order

* External Message *

Brandon,

Below (in red) are the Company's notes related to each request. Note that the Company added the associated files to the "Fieldwood Due Diligence -- Surety Document Request" box site under the folder "10-21-2020 Surety Requests."

- Complete copy of the Company's 12/31/19 Third-Party Reserve Report (only summary pages were provided, and our clients would like to review field level data as well); **Uploaded excel file with YE'19 and MY'20 onelines by field. Our YE'19 reserve report is audited by Ryder Scott. We do not have full 3rd party report. The oneline represents the field detail that was audited by Ryder Scott.**
- If completed, a copy of the Mid-Year Reserve Report with update pricing assumptions; **Uploaded excel file with YE'19 and MY'20 onelines by field.**
- Updated Decommissioning Trust Overview noting go-forward projections (current document only shows historical revenues, expense, net profits, and trust contributions); **Our deficit is on the Trust A NPI is >\$50 MM. In the current commodity price environment, we do not anticipate any significant contributions over the next 1-2 years.**
- Trust A Agreement (this was requested in the initial demands but not received); **Uploaded NPI conveyance agreement and Trust agreement.**
- A list of the properties that have been P&A'd, and specifically the amount of P&A that has taken place at each property. **This information is not readily available. We have uploaded a P&A overview that includes historical activity summaries.**
- Well-level cash flow statements, estimates, and summaries for all GOM operations for each of the Fieldwood entities **Please see the field level LOS that has been uploaded.**

Please let us know if you have any questions.

Thanks,

Weil

Clifford Carlson

Weil, Gotshal & Manges LLP
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Houston, TX 77002-2755
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From: Brandon Bains <bbains@l-llp.com>

Sent: Thursday, October 29, 2020 8:49 AM

To: Carlson, Clifford <Clifford.Carlson@weil.com>; 'Eisenberg, Philip' <peisenberg@lockelord.com>; Elliot Scharfenberg <escharfenberg@krebsfarley.com>; Grzyb, Darren <dgrzyb@csglaw.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>) <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>

Subject: RE: Fieldwood - Protective Order

Huh? See the e-mail at the very bottom below - when will those documents be provided?

Brandon Bains
214-722-7171

From: Carlson, Clifford <Clifford.Carlson@weil.com>

Sent: Thursday, October 29, 2020 8:47 AM

To: Brandon Bains <bbains@l-llp.com>; 'Eisenberg, Philip' <peisenberg@lockelord.com>; Elliot Scharfenberg <escharfenberg@krebsfarley.com>; Grzyb, Darren <dgrzyb@csglaw.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>) <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>

Subject: RE: Fieldwood - Protective Order

Hi Brandon,

I don't think we have answers for you on any of the below questions at this time - the parties to the RSA and Apache Term Sheet continue to work through these issues. We will get back to you as soon as we can.

Best,
Cliff



Clifford Carlson

Weil, Gotshal & Manges LLP
700 Louisiana, Suite 1700
Houston, TX 77002-2755
clifford.carlson@weil.com
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From: Brandon Bains <bbains@l-llp.com>

Sent: Thursday, October 29, 2020 8:20 AM

To: 'Eisenberg, Philip' <peisenberg@lockelord.com>; Carlson, Clifford <Clifford.Carlson@weil.com>; Elliot Scharfenberg <escharfenberg@krebbsfarley.com>; Grzyb, Darren <dgrzyb@csglaw.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>) <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>

Subject: RE: Fieldwood - Protective Order

Cliff:

When will the documentation/information detailed in the thread below be available?

Brandon Bains
214-722-7171

From: Eisenberg, Philip <peisenberg@lockelord.com>

Sent: Wednesday, October 21, 2020 1:42 PM

To: Carlson, Clifford <Clifford.Carlson@weil.com>; Elliot Scharfenberg <escharfenberg@krebbsfarley.com>; Grzyb, Darren <dgrzyb@csglaw.com>; Brandon Bains <bbains@l-llp.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>) <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>

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Cliff,

In addition with regard to the information requests can you provide separate lists of all properties to be in Fieldwood I and separately for Fieldwood II. Also The Term Sheet required within 45 days for Fieldwood ,with Apache consent, to identify any further Retained Properties for Fieldwood II even if they were legacy Apache properties, can you let us know if there are such other properties now agreed. Further what is the plan on properties which are legacy Apache properties operated by Fieldwood where Fieldwood acquired nonoperating interests in such properties from some one other than Apache. Will these properties be in Fieldwood I entirely or will the ownership be split in some fashion?

Philip Eisenberg
Locke Lord LLP
713-226-1304

From: Carlson, Clifford <Clifford.Carlson@weil.com>

Sent: Wednesday, October 21, 2020 10:43 AM

To: Elliot Scharfenberg <escharfenberg@krebsfarley.com>; Grzyb, Darren <dgrzyb@csglaw.com>; Brandon Bains <bbains@l-llp.com>; Eisenberg, Philip <peisenberg@lockelord.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>)' <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>

Subject: RE: Fieldwood - Protective Order

**** External email ****

Thanks Elliot and Darren. We will coordinate with the Company and get back to you as soon as possible.



Clifford Carlson

Weil, Gotshal & Manges LLP
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Houston, TX 77002-2755
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+1 713 224 9511 Fax

From: Elliot Scharfenberg <escharfenberg@krebsfarley.com>

Sent: Wednesday, October 21, 2020 9:41 AM

To: Grzyb, Darren <dgrzyb@csglaw.com>; Carlson, Clifford <Clifford.Carlson@weil.com>; Brandon Bains <bbains@l-llp.com>; Eisenberg, Philip <peisenberg@lockelord.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>)' <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>

Subject: RE: Fieldwood - Protective Order

Cliff,

In addition to the documents referenced by Darren, please also produce:

- Well-level cash flow statements, estimates, and summaries for all GOM operations for each of the Fieldwood entities

Thank you,

Elliot



Elliot Scharfenberg
400 Poydras Street, Suite 2500
New Orleans, Louisiana 70130
(504) 299-3583

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From: Grzyb, Darren <dgrzyb@csglaw.com>

Sent: Tuesday, October 20, 2020 4:55 PM

To: Carlson, Clifford <Clifford.Carlson@weil.com>; Brandon Bains <bbains@l-lp.com>; Eisenberg, Philip <peisenberg@lockelord.com>; Perez, Alfredo <alfredo.perez@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Marzocca, Anthony <Anthony.Marzocca@weil.com>; Swenson, Robert <Robert.Swenson@weil.com>

Cc: 'Brescia, Duane J.' <DBrescia@ClarkHill.com>; Zuber, Scott A. <szuber@csglaw.com>; '*lwoodard@harrisbeach.com' (<lwoodard@harrisbeach.com>)' <lwoodard@harrisbeach.com>; Shahinian, Armen <AShahinian@csglaw.com>; 'Ward, Christopher R.' <CWard@ClarkHill.com>; 'Michael Collins' <mcollins@manierherod.com>; 'rmiller@manierherod.com' <rmiller@manierherod.com>; Freedman, Terri Jane <tfreedman@csglaw.com>; Elliot Scharfenberg <escharfenberg@krebsfarley.com>

Subject: RE: Fieldwood - Protective Order

Cliff:

By my calculation, the Disclosure Statement, Plan of Reorganization and/or bidding procedures motion should have been filed by now. Also, the Definitive Apache Documents should have been filed. Please advise when we can expect to see these filings.

We also request that the Debtor supplement its production with the following information:

- Complete copy of the Company's 12/31/19 Third-Party Reserve Report (only summary pages were provided, and our clients would like to review field level data as well);
- If completed, a copy of the Mid-Year Reserve Report with update pricing assumptions;
- Updated Decommissioning Trust Overview noting go-forward projections (current document only shows historical revenues, expense, net profits, and trust contributions);
- Trust A Agreement (this was requested in the initial demands but not received);
- A list of the properties that have been P&A'd, and specifically the amount of P&A that has taken place at each property.

Thank you.

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Brown, Jase A.

From: Knapp, Bradley C. <bknapp@lockelord.com>
Sent: Wednesday, December 16, 2020 10:44 AM
To: clifford.carlson@weil.com; alfredo.perez@weil.com; Liou, Jessica;
anthony.marzocca@weil.com; robert.swenson@weil.com
Cc: Eisenberg, Philip; Grzyb, Darren; Brown, Jase A.; Zuber, Scott A.; Lee Woodard; Brescia,
Duane J.; Robert Miller
Subject: Fieldwood: surety production

*** External Message ***

Counsel—

Our clients and their consultants have reviewed Fieldwood's surety productions. Based on the review of that production, we have additional document and information requests detailed below. Please let us know if we can set a call later this week to discuss these requests.

Aries/PHDWin Database – (Fieldwood internal or Ryder Scott) This database should contain all properties, and we believe can be produced as a pdf or Excel matching the database information:

- Updated production
- Updated reserves categories (ie. an undeveloped well drilled moved to producing)
- Ownership interest
- Capital expenditure (for future work and abandonment)
- Operating cost assumptions
- Price and other economic parameters including pricing differentials
- Timing of future behind pipes and drills

Updated Lease operating statements – at least last 12 months trailing operating costs by field

Updated Revenue statements – at least 12 months trailing by field

Producing, Non-Producing, and undeveloped reserves dependent on a volumetric estimate— If the reserves estimate relies on an volumetric estimate, we request all data necessary to support the reserve estimate including but not limited to:

- Structure map for the subject zone
- Amplitude/Attribute maps
- Well logs
- Isopach maps
- Seismic lines where appropriate
- Cross-sections where appropriate
- Bottom hole pressure data
- Material Balance where appropriate
- Fluid characteristics
- AFEs for near term work

Shut in information

- Information regarding hurricane shut-in, and other shut-in fields
- plans for return to production, cost associated with restoring production

Lease schedules

- A breakdown of which properties are in Fieldwood I, Fieldwood II, and the deepwater silo

Many thanks,
Brad

Brad Knapp
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